

EXHIBIT DD

HOLSEY, BRITTANY
05/06/2019

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1 COMMON PLEAS COURT OF THE STATE OF OHIO
2 IN AND FOR THE COUNTY OF SUMMIT
3
4 MEMBER WILLIAMS, et al.,
5 Plaintiffs,
6 vs. JUDGE JAMES A. BROGAN
 CASE NO. CV-2016-09-3928
7
8 KISLING, NESTICO & REDICK
 LLC, et al.,
9 Defendants.

10
11 VIDEOTAPED DEPOSITION OF
12 BRITTANY HOLSEY
13 MONDAY, MAY 6, 2019
14 8:49 A.M.
15 Hilton Akron/Fairlawn Hotel
16 3180 West Market Street
17 Fairlawn, Ohio
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REPORTED BY:

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<p>1 Q Onto what? Do you know what --</p> <p>2 A On his iPad. I don't know what documentation.</p> <p>3 I wasn't all up in his iPad or whatever it was.</p> <p>4 I wasn't --</p> <p>5 Q Didn't that concern you, that somebody copied</p> <p>6 and pasted your signature on a document?</p> <p>7 A I thought he -- I mean you trust people that</p> <p>8 work for a company with lawyers. You trust</p> <p>9 them. I was young. I should have paid better</p> <p>10 attention.</p> <p>11 Q Well, did you ask what he was pasting your</p> <p>12 signature on?</p> <p>13 A No. Why would I ask him? I thought he was</p> <p>14 doing his job.</p> <p>15 Q Well, didn't you want to know what you were</p> <p>16 signing?</p> <p>17 A I thought he was doing his job. What I thought</p> <p>18 was me getting -- hiring KNR. That was it.</p> <p>19 Q You knew when you signed you were signing for</p> <p>20 KNR to represent you, true?</p> <p>21 A True.</p> <p>22 Q That was when the gentleman was out with you at</p> <p>23 your mom's house, true?</p> <p>24 A True.</p> <p>25 Q Monique was there with you?</p>	<p>1 Q He's passed --</p> <p>2 A -- deceased.</p> <p>3 Q -- away, correct?</p> <p>4 A Yes.</p> <p>5 Q When did he pass?</p> <p>6 A I think a year, two years ago. I don't</p> <p>7 remember.</p> <p>8 Q In the records at KNR it indicates that "Said</p> <p>9 that uncle gave her our number. She is not</p> <p>10 sure how he heard about us. Dennis Baylor is</p> <p>11 uncle's name."</p> <p>12 Does that refresh your recollection at</p> <p>13 all?</p> <p>14 A Yeah, probably so, but I don't remember. It</p> <p>15 could have been him. I don't remember.</p> <p>16 Q Okay. You didn't decide to call KNR because of</p> <p>17 the advertisements you saw, you got a referral</p> <p>18 from either --</p> <p>19 A I don't remember.</p> <p>20 Q Okay. I will represent to you that Monique</p> <p>21 testified it was actually your mom, I think,</p> <p>22 that recommended KNR.</p> <p>23 Do you recall that?</p> <p>24 A I don't remember.</p> <p>25 Q Do you recall talking to anybody about KNR</p>
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<p>1 A Yes, she was there.</p> <p>2 Q She was there to hear the gentleman say as well</p> <p>3 that this document -- signing this means KNR</p> <p>4 represents you, true?</p> <p>5 A That's it. Yeah. Uh-huh.</p> <p>6 Q Now I want to ask you about Brown Street. You</p> <p>7 said something about drug dealers. Let me back</p> <p>8 up.</p> <p>9 Before we get there, how did you hear up</p> <p>10 KNR?</p> <p>11 A I've been heard about it. You see it on the</p> <p>12 buses and stuff like that and it's on the</p> <p>13 radio. You hear about it.</p> <p>14 Q How is it that you decided to call KNR to be</p> <p>15 represented in this case?</p> <p>16 A I don't remember.</p> <p>17 Q Do you recall if somebody recommended --</p> <p>18 A I don't remember.</p> <p>19 Q Okay. You don't have any memory at all of</p> <p>20 that?</p> <p>21 A No.</p> <p>22 Q Who is Dennis Baylor?</p> <p>23 MS. NORRIS: Can you please</p> <p>24 not bring my uncle's name up?</p> <p>25 A That's my uncle and he's --</p>	<p>1 before you called them?</p> <p>2 A I don't remember.</p> <p>3 Q What do you recall about that first</p> <p>4 conversation with KNR on the phone? Do you</p> <p>5 remember anything?</p> <p>6 A No, I don't remember. All I remember is the</p> <p>7 guy coming out and me signing one time and he's</p> <p>8 copying and pasting signatures. And from there</p> <p>9 I don't remember. Really, absolutely nothing.</p> <p>10 Try to reach them, like I said. I don't -- no,</p> <p>11 I don't remember.</p> <p>12 Q Going back, though, I just want to make sure --</p> <p>13 A I don't remember.</p> <p>14 Q On the first conversation you had with KNR on</p> <p>15 the phone, were you and Monique on the phone</p> <p>16 together with KNR?</p> <p>17 A I don't remember.</p> <p>18 Q Do you recall how long that phone conversation</p> <p>19 lasted?</p> <p>20 A I don't remember.</p> <p>21 Q You recall that you agreed to be represented</p> <p>22 during that phone call and they said they would</p> <p>23 send somebody out?</p> <p>24 A No. No. I don't remember.</p> <p>25 Q One way or another?</p>